

Exhibit C

Affidavit of Mel C. Orchard, III

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**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF WYOMING**

MICHELLE OLIVER, Plaintiff, v. HEALTHTECH MANAGEMENT SERVICES, INC., WILLIAM D. PATTEN, JEFFREY HANSEN, M.D., and POWELL VALLEY HEALTH CARE, INC., Defendants.	Civil No. 14 CV 168-S
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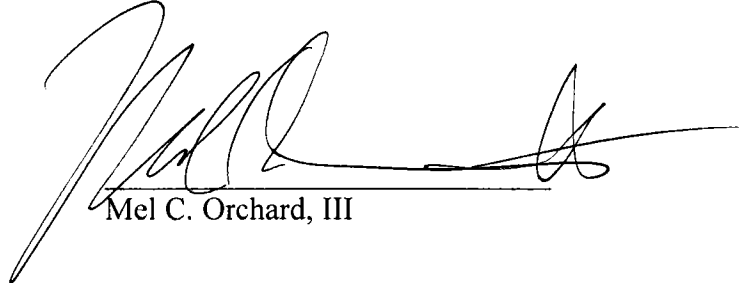
AFFIDAVIT OF MEL C. ORCHARD, III

State of Minnesota)
)
County of Hennepin)

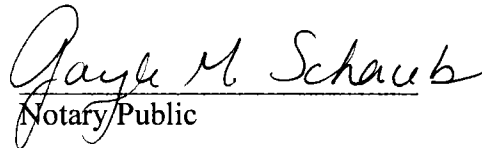
Mel C. Orchard, III, being first duly sworn, deposes and states under oath as follows:

1. I am over 18 years of age and am competent to make this affidavit.
2. I am an attorney for Plaintiff Michelle Oliver.
3. HealthTech and William D. Patten's Motion to Dismiss was filed before any discovery occurred in this case.
4. If the Court converts Defendants' Motion into a motion for summary judgment, further discovery is needed to allow Plaintiff to prepare a full and complete defense to Defendants' Motion, including but not limited to, exploring the following issues:
 - a. The level of control Patten and HealthTech exercised over the hiring, supervision, and credentialing of PVHC physicians;
 - b. The nature and extent of complaints provided, even if indirectly (i.e. notice) to Patten and HealthTech about health care providers at PVHC, including Dr. Hansen;
 - c. The level of control the PVHC hospital board exercised over Patten and HealthTech's personnel decisions;
 - d. The extent to which Patten communicated complaints or concerns about Dr. Hansen to other HealthTech employees;
 - e. The nature and extent of any advice Patten or HealthTech supplied to PVHC regarding Dr. Hansen's hiring, continued employment, scope of privileges, or re-credentialing;
 - f. All contracts between HealthTech, Patten, and PVHC and its physicians, with all, some or with either of the above;
 - g. Documents indicating whether Patten and HealthTech had financial incentives tied to PVHC's performance;
 - h. The bylaws of PVHC;
 - i. The extent to which HealthTech and PVHC's relationship was disclosed in any manner to the community, PVHC patients, and PVHC employees;

- j. All matters touched upon in Plaintiff's response in opposition to Defendants' motion to dismiss, including all communications, documents, emails, or the like concerning Patten's role, responsibilities, or that reflect on his customs and practices in doing his job.


Mel C. Orchard, III

SUBSCRIBED AND SWORN TO before me on this 10th day of February, 2015.


Notary Public

My Commission Expires:

Jan. 31, 2020

My Commission Number:

6124921

